

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

|  |   |
|--|---|
| <p>PREBLE-RISH HAITI, S.A.,</p> <p style="text-align: center;"><i>Petitioner,</i></p> <p style="text-align: center;">-against-</p> <p>REPUBLIC OF HAITI, BUREAU DE<br/>MONÉTISATION DES PROGRAMMES D'AIDE<br/>AU DÉVELOPPEMENT,</p> <p style="text-align: center;"><i>Respondents.</i></p> | <p style="text-align: center;">22-cv-07503 (PKC)<br/>Related cases: 21-cv-6704 (PKC) and<br/>21-cv-4960 (PKC)</p> <p style="text-align: center;"><b>DECLARATION OF ELIZABETH<br/>WOLSTEIN IN RESPONSE TO<br/>ORDER TO SHOW CAUSE<br/>REGARDING MOOTNESS</b></p> |
|--|---|

**ELIZABETH WOLSTEIN** declares as follows pursuant to 28 U.S.C. § 1746:

I am a partner of the law firm Schlam Stone & Dolan LLP, co-counsel for the Republic of Haiti (the “Republic”) in the above-captioned action. I am admitted to the bar of this Court.

1. I submit this Declaration in response to this Court’s Order to Show Cause as to why Haiti’s Motion for Relief from Judgments, or Alternatively to Alter or Amend the Judgments, (ECF Nos. 63, 64, 65-65-6, 66-66-3, 67, 68, 82, 83-83-2 the “Motion”), ought not to be denied as moot. (ECF No. 116 at 26). Specifically, this Declaration places before the Court certain publicly-filed court documents referred to in the Republic’s accompanying memorandum of law concerning mootness.

2. Attached as Exhibit A is a true and correct copy of Opposed Motion For Post-Judgment Discovery, ECF Doc. No. 171, in *Preble-Rish Haiti, S.A. v. Republic of Haiti et al.*, No. 21-cv-01953 (S.D. Texas), as publicly filed on PACER.

3. Attached as Exhibit B is a true and correct copy of Clerk’s Certification of a Judgment To Be Registered in Another District/Other Miscellaneous Relief, ECF Doc. No. 1, in

*Preble-Rish Haiti, S.A. v. Republic of Haiti et al.*, No. 22-mc-00304 (S.D. Texas), as publicly filed on PACER.

4. Attached as Exhibit C is a true and correct copy of Application for Writ of Garnishment and Turnover Order, ECF Doc. No. 1, in *Preble-Rish Haiti, S.A. v. American Airlines, Inc.* No. 22-cv-00627-P (N.D. Texas), as publicly filed on PACER.

5. Attached as Exhibit D is a true and correct copy of Registration of Judgment From Another Court, ECF Doc. No. 1 in *Preble-Rish Haiti, S.A. v. Republic of Haiti et al.*, 22-mc-00010-Y (N.D. Texas), as publicly filed on PACER.

6. Attached as Exhibit E is a true and correct copy of Motion for Voluntary Dismissal with Prejudice of Garnishee BB Energy USA, LLC, ECF Doc. No. 206, in *Preble-Rish Haiti, S.A. v. Republic of Haiti et al.*, No. 21-cv-01953 (S.D. Texas), as publicly filed on PACER.

7. Attached as Exhibit F is a true and correct copy of Order On Application For Writ Of Garnishment, ECF Doc. No. 6, in *Preble-Rish Haiti, S.A. v. Republic of Haiti et al.*, No. 21-cv-01953 (S.D. Texas), as publicly filed on PACER.

8. Attached as Exhibit G is a true and correct copy of Writ of Garnishment And Order Directing Garnishee To Turn Over Assets Issued as to American Airlines, Inc., ECF Doc. No. 5, in *Preble-Rish Haiti, S.A. v. American Airlines, Inc.* No. 22-cv-00627 (N.D. Texas), as publicly filed on PACER.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 13, 2023.

/s/ Elizabeth Wolstein  
Elizabeth Wolstein